

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Telecommunications Relay Services and)	CG Docket No. 03-123
Speech-to-Speech Services for)	
Individuals with Hearing and Speech Disabilities)	
)	
E911 Requirements for IP-Enabled Service)	WC Docket No. 05-196
Providers)	
)	
Petition for Reconsideration and Clarification of)	
Paragraphs 60 & 61 of the FCC Report and)	
Order on Ten-Digit Numbering)	

OPPOSITION OF SORENSON COMMUNICATIONS, INC.

Pursuant to Section 1.429(f) of the Commission's rules,¹ Sorenson Communications, Inc. ("Sorenson") hereby submits its Opposition to the Petition for Reconsideration and Clarification filed by CSDVRS, LLC, GoAmerica, Inc., Viable, Inc. and Snap Telecommunications, Inc. ("Petitioners").² For the reasons explained below, the Federal Communications Commission ("FCC" or "Commission") should deny the Petition.

I. INTRODUCTION AND BACKGROUND

In its June 2008 *Numbering Order*, the FCC adopted a ten-digit telephone numbering system for Internet-based Telecommunications Relay Service ("TRS") and

¹ 47 C.F.R. § 1.429(f).

² Petition for Reconsideration and Clarification by CSDVRS, LLC, GoAmerica, Inc., Viable, Inc. and Snap Telecommunications, Inc., CG Docket No. 03-123 & WC Docket No. 05-196 (Aug. 15, 2008) ("Petition"); *see also* Public Notice, Report No. 2872 (rel. Aug. 20, 2008), 73 Fed. Reg. 50,971-72 (Aug. 29, 2008).

established a requirement for users to register with a default provider.³ As part of its Order, the FCC delineated the obligations of default providers as well as the obligations of “former default providers,” in cases where users port their numbers to a new default provider.⁴ Specifically, the Order requires that default providers obtain current routing information from their registered users, provision such information to the central database, and maintain it in their internal databases and in the central database.⁵ The Order also requires that providers “*cease* acquiring routing information from any Internet-based TRS user that ports his or her number to another provider or otherwise selects a new default provider.”⁶

The Petitioners ask the FCC to reconsider these requirements. Specifically, Petitioners ask that when a provider supplies its users with equipment, the FCC give users the option of having the original provider continue to provision routing information to the central database even after the user ports his or her number to a new default provider.⁷ For the reasons discussed below, the Petition should be denied.

³ *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; E911 Requirements for IP-Enabled Service Providers*, Report and Order and Further Notice of Proposed Rulemaking, 23 FCC Rcd. 11591, ¶¶ 1, 42 (2008) (“*Numbering Order*”).

⁴ *Id.* ¶¶ 60-61; 47 C.F.R. § 64.611(c).

⁵ *Numbering Order* ¶ 60.

⁶ *Id.* ¶ 61 (emphasis in original). In addition, providers must ensure that all customer premises equipment (“CPE”) they have provided to users of Internet-based TRS delivers routing information only to the user’s default provider, except as is necessary to complete or receive “dial around” calls on a case-by-case basis. *Id.*; 47 C.F.R. § 64.611(e).

⁷ Petition at 3-4.

II. DISCUSSION

Petitioners argue that complying with the new rules governing default and former default providers would be “daunting.”⁸ Sorenson is making progress toward meeting the new requirements and has already developed a plan to have backend integration with the third party database provider. Whether one describes the work that remains as “daunting” or not, it can be done, at least for Sorenson devices. Implementation of the new rules will require development of an industry standard to ensure that each provider can accept routing information delivered by devices distributed by another provider. Although the Commission has set providers a challenge, Sorenson is prepared to meet this challenge and comply with the new rules by accommodating an industry standard as soon as one is established.

More fundamentally, the Petition should be denied because the Commission made the right decision in placing the responsibility for updating and maintaining routing information with the default provider and limiting the information acquired by the former default provider. The rules reflect a recognition that it is best to have a single provider, chosen by the user, be responsible for obtaining, provisioning and maintaining the user’s routing information. If Petitioners’ request were granted, two providers would share these critical responsibilities, which would not serve users well. Adopting Petitioners’ proposed changes would raise questions about which provider would ultimately be responsible for updating the user’s information. In the event that a problem occurred with a user’s routing information, would the user have to go to both providers? What would happen if both providers disclaimed responsibility? These issues become especially problematic when emergency calls are considered. The rule adopted by the Commission minimizes these dilemmas by clearly placing responsibility for the user’s routing

⁸ *Id.* at 3.

information with the default provider and by severely limiting the role to be played by the former default provider.

III. CONCLUSION

For the reasons stated above, the Petition should be denied.

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September 15, 2008

Certificate of Service

I hereby certify that on this 15th day of September, 2008, I caused true and correct copies of the foregoing Opposition of Sorenson Communications, Inc. to be served by first class U.S. mail, postage prepaid, addressed to:

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